

Daniel J. Flanigan (NY #4266250)  
Polsinelli Shalton Flanigan Suelthaus PC  
7 Penn Plaza, Suite 600  
New York, New York 10001  
(212) 684-0199  
Fax: (212) 684-0197  
[dflanigan@polsinelli.com](mailto:dflanigan@polsinelli.com)

Christopher A. Ward (DE #3877)  
Polsinelli Shalton Flanigan Suelthaus PC  
222 Delaware Avenue, Suite 1101  
Wilmington, Delaware 19801  
(302) 252-0922  
Fax No. (302) 252-0921  
[cward@polsinelli.com](mailto:cward@polsinelli.com)

Kim Martin Lewis  
Patrick D. Burns  
DINSMORE & SHOHL, LLP  
1900 Chemed Center  
255 East Fifth Street  
Cincinnati, OH 45202  
(513) 977-8200  
Fax: (513) 977-8141

Attorneys for The Standard Register Company

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re:**

**LEHMAN BROTHERS HOLDINGS,  
INC., et al.,**

**Debtors.**

**Chapter 11**

**Case No.: 08-13555 (JMP)**

**(Jointly Administered)**

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**LIMITED OBJECTION OF THE STANDARD REGISTER COMPANY  
TO THE CURE AMOUNT OF ITS CLOSING DATE CONTRACT**

The Standard Register Company, an Ohio corporation (“Standard Register”), by and through its undersigned counsel, hereby submits this Objection to Cure Amount (the “Objection”). In support thereof, Standard Register respectfully represents as follows:

1. On September 15, 2008, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed separate voluntary petitions for relief under chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”).

2. On September 17, 2008, the Debtors filed their Motion to (A) Schedule a Sale Hearing; (B) Establish Sales Procedures; (C) Approve a Break-Up Fee; and (D) Approve the Sale of the Purchased Assets and the Assumption and Assignment of Contracts Relating to the Purchased Assets (the “Motion”).

3. On September 20, 2008, the Court entered an Order Authorizing and Approving (A) the Sale of Purchased Assets Free and Clear of Liens and Other Interests and (B) Assumption and Assignment of Executory Contracts and Unexpired Leases (the “Order”).

4. Pursuant to the Order, certain procedures were established for the resolution and payment of cure amounts for executory contracts (the “Closing Date Contracts”) that are being assumed and assigned to the purchaser.

5. Standard Register was listed as a Closing Date Contract on the List of Non-IT Closing Date Contracts (Excluding Commercial Real Estate), with a listed cure amount of \$22,766.35. Standard Register hereby objects to the alleged cure amount of \$22,766.35 and asserts a cure amount of \$1,070,637.05.

6. Standard Register has a longstanding relationship with the Debtors, dating back at least to 1995 wherein Standard Register supplies the Debtors, upon Debtors’ purchase orders, with miscellaneous business forms, including, but not limited to trade confirmation forms, account statement forms, envelopes and stationary forms. Standard Register until, needed by the Debtors, warehouses all of these forms. Any product that is not released within one year, at

that point, will be invoiced in full and either remain in the warehouse for future use or be destroyed as obsolete product.

7. The Debtor has prepetition obligations of \$658,226.38 on product that has been shipped and is subject to currently outstanding invoices. In addition, \$412,410.67 worth of product is currently sitting in the warehouse as a result of orders for its production. As a result, the total amount necessary to cure the outstanding balance, as more fully described in summary form attached hereto as Exhibit A, which is hereby incorporated by reference, is \$1,070,637.05.<sup>1</sup>

WHEREFORE, Standard Register objects to the cure amount of \$22,766.35 and requests a cure amount of \$1,070,637.05. Standard Register hereby reserves its right to amend or file further objections and/or claims in this case.

Dated: October 3, 2008

Respectfully submitted,

/s/ Daniel J. Flanigan

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New York, New York 10001  
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Fax: (212) 684-0197  
[dflanigan@polsinelli.com](mailto:dflanigan@polsinelli.com)

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<sup>1</sup> Standard Register has attached a summary of the outstanding invoices and detail regarding the product currently being warehoused. There are currently more than 320 purchase orders outstanding and therefore the documentation is voluminous. Copies of all supporting documents are available upon request to the Standard Register's counsel as identified herein.

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**CERTIFICATE OF SERVICE**

I, Daniel J. Flanigan, hereby certify that on the 3<sup>rd</sup> day of October, 2008, a true and correct copy of the *Limited Objection of The Standard Register Company to the Cure Amount of Its Closing Date Contract* was served electronically to Debtors' counsel and all parties who are registered to receive ECF notification from the Court, and by First Class United States mail, postage prepaid, to the U.S. Trustee and all parties who have requested notice but are not registered to receive ECF notification from the Court.

/s/ Daniel J. Flanigan